

Exhibit E

Movius, David

From: Movius, David
Sent: Thursday, July 18, 2013 2:11 PM
To: 'Yanchar, Georgia'; 'McLandrich, John'
Cc: 'McMullen, Dan'
Subject: RE: MRI v. Lynx - email production

Georgia –

I propose that both parties agree to complete their productions by August 22, and that we extend the fact discovery cut-off until October 15 instead of October 1. If that is acceptable to MRI, you have my consent to revise the motion with respect to the October 15 date and file it with the Court. I also look forward to receiving MRI's proposal regarding source code.

Regards,

Dave

David T. Movius
Member

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From: Yanchar, Georgia [mailto:GYanchar@Calfee.com]
Sent: Tuesday, July 16, 2013 3:59 PM
To: Movius, David; 'McLandrich, John'
Cc: McMullen, Dan
Subject: RE: MRI v. Lynx - email production

David,

We will be making a substantial production via hand delivery to you tomorrow. We will produce any remaining documents you have requested (other than source code) by August 22 (I would say August 15, but our litigation support coordinator, who coordinates our document productions, is on vacation the first two weeks in August).

As to source code, as we discussed, MRI is willing to make it available for inspection subject to appropriate protections. We expect to send you a proposed source code supplemental protective order within the next few days. Assuming we can reach agreement as to that, then we would expect all document production to be completed on behalf of MRI by August 22.

Please confirm Lynx will complete its document production by August 15, and we will file the joint motion.

Regards,

Georgia

Georgia E. Yanchar

Attorney At Law

gyanchar@calfee.com

216.622.8233 **Phone**

216.241.0816 **Fax**

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From: Movius, David [<mailto:dmovius@mcdonaldhopkins.com>]

Sent: Tuesday, July 16, 2013 11:45 AM

To: Yanchar, Georgia; 'McLandrich, John'

Cc: McMullen, Dan

Subject: RE: MRI v. Lynx - email production

Georgia -

Thank you for your response. Lynx will confirm that it will complete its document production by August 15 provided it receives similar assurances from MRI as to a date certain on which it will provide the documents referenced in your June 13 email and that its document production will be complete by August 15. We also await MRI's response regarding production of source code.

Regards,

Dave

David T. Movius

Member

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From: Yanchar, Georgia [<mailto:GYanchar@Calfee.com>]

Sent: Tuesday, July 16, 2013 10:55 AM

To: Movius, David; 'McLandrich, John'

Cc: McMullen, Dan

Subject: RE: MRI v. Lynx - email production

Dave,

Thanks. These changes are fine. Please confirm Lynx will complete its document production no later than August 15, and we will get this on file.

Regards,

Georgia

Georgia E. Yanchar

Attorney At Law

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From: Movius, David [<mailto:dmovius@mcdonaldhopkins.com>]

Sent: Monday, July 15, 2013 4:25 PM

To: Yanchar, Georgia; 'McLandrich, John'

Cc: McMullen, Dan

Subject: RE: MRI v. Lynx - email production

Georgia –

Our comments are attached.

Regards,

Dave

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From: Yanchar, Georgia [<mailto:GYanchar@Calfee.com>]
Sent: Monday, July 15, 2013 1:06 PM
To: 'McLandrich, John'
Cc: Movius, David; McMullen, Dan
Subject: RE: MRI v. Lynx - email production

John,

I realized I forgot to include MRI's Motion to Amend among the list of pending motions. Please review this version instead.

Regards,

Georgia

Georgia E. Yanchar

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From: Yanchar, Georgia
Sent: Monday, July 15, 2013 12:38 PM
To: 'McLandrich, John'
Cc: 'Movius, David'; McMullen, Dan
Subject: RE: MRI v. Lynx - email production

John,

Following up on our exchange below, attached is a proposed joint motion for your review. The proposed joint motion contemplates completion of Lynx's production no later than August 15. Please confirm you would anticipate completion by that time.

Regards,

Georgia

From: Yanchar, Georgia
Sent: Friday, July 12, 2013 2:03 PM
To: 'McLandrich, John'
Cc: Movius, David; McMullen, Dan
Subject: RE: MRI v. Lynx - email production

John,

Thanks. I will prepare the motion, but I think the central question before filing it is when to expect Lynx's email production. Perhaps we can plan to touch base on Monday morning, and make a joint filing then.

Regards,

Georgia

From: McLandrich, John [<mailto:JTM@MRRLAW.com>]
Sent: Friday, July 12, 2013 8:29 AM
To: Yanchar, Georgia; McLandrich, John
Cc: Movius, David; McMullen, Dan
Subject: RE: MRI v. Lynx - email production

Georgia:

That is fine, except our prior agreement is to produce emails expeditiously. We will do this. We are reviewing the Robinson email now and should have them for you next week. I will confer with David and provide the you a projected completion date for the remainder. I recall that you were going to prepare a motion with the court on deadlines. We will be back to you soo .

Sincerely, John

Sent from my Verizon Wireless 4G LTE smartphone

----- Original message -----

From: "Yanchar, Georgia" <GYanchar@Calfee.com>
Date: 07/11/2013 8:04 PM (GMT-05:00)
To: "McLandrich, John" <JTM@MRRLAW.com>
Cc: "Movius, David" <dmovius@mcdonaldhopkins.com>, "McMullen, Dan" <dmcullen@calfee.com>
Subject: Re: MRI v. Lynx - email production

John,

Thanks for your message. During our call last week, we thought that we conveyed that MRI continues to want production of all responsive documents, that Lynx agreed to provide a date by when it would complete its production of emails, that Robinson's emails would be produced before the other remaining responsive emails, and that we would inform the Court accordingly this week. As it stands, we continue to await the vast majority of relevant responsive emails, we have no emails for any of the Lynx employees whose depositions we have noticed, and we do not know when to expect such emails from Lynx. Please let us know when Lynx expects to complete its email production.

Regards,

Georgia

On Jul 10, 2013, at 3:43 PM, "McLandrich, John" <JTM@MRRLAW.com<<mailto:JTM@MRRLAW.com>>> wrote:

Georgia: My recollection is that we were asked to and agreed to review the Robinson email first. We are doing that review now. It will take several few days. I thought you were then going to consider if you wanted to agree to search terms for the remainder or just have us review them all. If we review them all that will take a couple weeks I would think.

Sincerely, John

John T. McLandrich
Direct: (440) 287-8298
jtm@mrllaw.com<<mailto:jtm@mrllaw.com>>

<image001.png>

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From: Yanchar, Georgia [<mailto:GYanchar@Calfee.com>]

Sent: Tuesday, July 09, 2013 4:18 PM

To: 'Movius, David'; McLandrich, John

Cc: McMullen, Dan

Subject: MRI v. Lynx - email production

Dear David and John,

Following up on our conversation last Monday, I believe you were planning to confer with Lynx's vendor as to timing for production of Don Robinson's email, and timing for completion of Lynx's email production. Please let me know if you have a sense of the foregoing, so that we can inform the Court as to a realistic schedule for completing fact discovery.

Regards,

Georgia

Georgia E. Yanchar

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